

1 HAROLD J. MCELHINNY (CA SBN 66781)  
 hmcclhinny@mofo.com  
 2 MICHAEL A. JACOBS (CA SBN 111664)  
 mjacobs@mofo.com  
 3 RICHARD S.J. HUNG (CA SBN 197425)  
 rhung@mofo.com  
 4 MORRISON & FOERSTER LLP  
 425 Market Street  
 5 San Francisco, California 94105-2482  
 Telephone: (415) 268-7000  
 6 Facsimile: (415) 268-7522

WILLIAM F. LEE (*pro hac vice*)  
 william.lee@wilmerhale.com  
 WILMER CUTLER PICKERING  
 HALE AND DORR LLP  
 60 State Street  
 Boston, Massachusetts 02109  
 Telephone: (617) 526-6000  
 Facsimile: (617) 526-5000

MARK D. SELWYN (SBN 244180)  
 mark.selwyn@wilmerhale.com  
 WILMER CUTLER PICKERING  
 HALE AND DORR LLP  
 950 Page Mill Road  
 Palo Alto, California 94304  
 Telephone: (650) 858-6000  
 Facsimile: (650) 858-6100

*Attorneys for Plaintiff and  
 Counterclaim-Defendant Apple Inc.*

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

15 APPLE INC., a California corporation,  
 16  
 Plaintiff,  
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 v.  
 18 SAMSUNG ELECTRONICS CO., LTD., a  
 Korean corporation; SAMSUNG ELECTRONICS  
 19 AMERICA, INC., a New York corporation; and  
 SAMSUNG TELECOMMUNICATIONS  
 20 AMERICA, LLC, a Delaware limited liability  
 company,  
 21  
 Defendants.

Case No. 11-cv-01846-LHK (PSG)

**JOINT STIPULATION AND  
 [PROPOSED] ORDER  
 EXTENDING THE DEADLINE  
 TO FILE A REPLY IN SUPPORT  
 OF APPLE’S MOTION TO  
 COMPEL**

1           WHEREAS, on March 15, 2012, Apple Inc. (“Apple”) filed a Motion to Compel Samsung  
2 Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications  
3 America, LLC (collectively “Samsung,” and together with Apple, “the Parties” and individually  
4 each a “Party”) to produce (i) documents relating to positions Samsung has taken in other  
5 litigations regarding the licensing of patents and other intellectual property rights (“IPR”) claimed  
6 to be essential to the UMTS standard, the determination of a fair, reasonable and non-  
7 discriminatory (“FRAND”) royalty, and the propriety of injunctive relief for the infringement of  
8 IPR claimed to be essential to the UMTS standard; and (ii) documents concerning Samsung’s  
9 plans for the development, marketing or licensing of IPR that is claimed to be essential to the  
10 UMTS standard.

11           WHEREAS, on March 29, 2012, Samsung filed an Opposition to Apple’s Motion to  
12 Compel;

13           WHEREAS, pursuant to Civ. L.R. 7-3(c), the reply in support of Apple’s Motion to  
14 Compel is currently due to be filed on or before April 5, 2012;

15           WHEREAS, on March 28, 2012, Samsung made a proposal to Apple in an effort to  
16 resolve the matters raised in Apple’s Motion to Compel, to which Apple responded on that same  
17 date;

18           WHEREAS, since March 28, 2012, the Parties have continued to exchange proposals in  
19 an effort to resolve the matters raised in Apple’s motion, including exchanging language for a  
20 proposed joint stipulation to resolve these issues on March 30, April 3, and April 4, 2012;

21           WHEREAS, the Parties are continuing to meet and confer regarding a joint stipulation to  
22 resolve this discovery dispute without the Court’s intervention, but require additional time to  
23 continue their negotiations to see whether a resolution can be reached;

24           WHEREAS, the new deadline jointly proposed by the Parties (April 10, 2012) for Apple  
25 to file its reply in support of Apple’s Motion to Compel would still allow the Court thirteen (13)  
26 days before the April 24, 2012 hearing in which to consider all papers on the Motion;

27           NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties as  
28 follows:

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1. The filing date for the reply in support of Apple’s Motion to Compel will be extended to and including April 10, 2012;
2. No other dates or deadlines shall be modified by this stipulation and order; and
3. This extension of time is without prejudice to either Apple or Samsung, and shall not be construed or otherwise used in any way to support a contention of delay, untimeliness, or lack of harm to Apple or Samsung arising from the acts alleged in this action or this motion.

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Dated: April 5, 2012

Dated: April 5, 2012

/s/ Mark D. Selwyn  
William F. Lee  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
60 State Street  
Boston, Massachusetts 02109  
Telephone: (617) 526-6000  
Facsimile: (617) 526-5000

Mark D. Selwyn  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
950 Page Mill Road  
Palo Alto, California 94304  
Telephone: (650) 858-6000  
Facsimile: (650) 858-6100

Harold J. McElhinny  
Michael A. Jacobs  
Richard S.J. Hung  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, California 94105  
Telephone: (415) 268-7000  
Facsimile: (415) 268-7522

*Counsel for Plaintiff and Counterclaim-  
Defendant Apple Inc.*

/s/ Victoria Maroulis  
Charles K. Verhoeven  
QUINN EMANUEL URQUHART  
& SULLIVAN LLP  
50 California Street, 22<sup>nd</sup> Floor  
San Francisco, California 94111  
Telephone: (415) 875-6600

Victoria Maroulis  
Rachel Herrick Kassabian  
QUINN EMANUEL URQUHART  
& SULLIVAN LLP  
555 Twin Dolphin Drive, 5<sup>th</sup> Floor  
Redwood Shores, California 94065  
Telephone: (650) 801-5066

Diane C. Hutnyan  
QUINN EMANUEL URQUHART  
& SULLIVAN LLP  
865 S. Figueroa St., 10<sup>th</sup> Floor  
Los Angeles, California 90017  
Telephone: (213) 443-3000

*Counsel for Samsung Electronics Co., Ltd.,  
Samsung Electronics America, Inc., and  
Samsung Telecommunications America, LLC*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2012

By: \_\_\_\_\_  
The Honorable Paul S. Grewal  
United States Magistrate Judge

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**ATTESTATION OF E-FILED SIGNATURE**

I, Mark D. Selwyn, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Victoria Maroulis has concurred in this filing.

Dated: April 5, 2012

/s/ Mark. D Selwyn  
Mark D. Selwyn